

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. __

**ORDER GRANTING EMERGENCY MOTION OF DEBTORS (I) ADJOURNING
CERTAIN MATTERS SET FOR HEARING ON OCTOBER 22, 2024 AND
(II) EXTENDING THE DEADLINE TO FILE A REPLY**

Upon the motion (the “Motion”) of FTX Trading Ltd., and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for an entry of an order (this “Order”) adjourning the hearing scheduled for October 22, 2024 at 1:00 p.m. (ET) with respect to the *Debtors’ Objection to Proofs of Claim Filed By Seth Melamed* [D.I. 20051] (the “Melamed Objection”), pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 9006, and Local Rule 2002; and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Motion in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and upon consideration of the Motion; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Motion and the relief

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

requested therein has been provided in accordance with the Bankruptcy Rules, the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and any replies (if any) to the Motion having been withdrawn, resolved or overruled on the merits; and upon the record of any hearing held to consider the relief requested in the Motion; and this Court having found and determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth herein.
2. The Melamed Objection, set for hearing on October 22, 2024, shall be adjourned to the omnibus hearing scheduled for December 12, 2024, at 1:00 p.m. (ET).
3. The reply deadline is extended to December 9, 2024.
4. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.
5. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.
6. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation and enforcement of this Order.

Dated: _____, 2024
Wilmington, Delaware

THE HONORABLE JOHN T. DORSEY
CHIEF UNITED STATES BANKRUPTCY JUDGE